IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

United States of America ex rel. Alex Doe, Relator, The State of Texas No. 2:21-CV-00022-Z ex rel. Alex Doe, Relator, The State of Louisiana ex rel. Alex Doe, Relator, Date: February 24, 2023 Plaintiffs, v. Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., § § Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc., Defendants.

AFFILIATE DEFENDANTS' NOTICE REGARDING RELATOR'S MOTION TO COMPEL

In light of the Court's Order granting Defendants' Motion to Stay (ECF No. 446), Affiliate Defendants understand that all aspects of this matter are stayed, including the deadline to respond to Relator's Motion to Compel Production of Document on Defendants' Privilege Log (the "Motion") (ECF No. 433). Affiliate Defendants oppose the Motion in its entirety and intend to file a brief to that effect once the stay is lifted. Affiliate Defendants, however, stand ready to file such a brief promptly during the pendency of the stay should the Court so order.

Dated: February 24, 2023 Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Tirzah S. Lollar

Tirzah S. Lollar

Tirzah.Lollar@arnoldporter.com

Craig D. Margolis

Craig.Margolis@arnoldporter.com

Christian Sheehan

Christian.Sheehan@arnoldporter.com

Emily Reeder-Ricchetti

Emily.Reeder-Ricchetti@arnoldporter.com

Megan Pieper

Megan.Pieper@arnoldporter.com

Alyssa Gerstner

Alyssa.Gerstner@arnoldporter.com

601 Massachusetts Ave, NW

Washington, DC 20001-3743

Telephone: +1 202.942.6127

Fax: +1 202.942.5999

Paula Ramer

Paula. Ramer@arnoldporter.com

250 West 55th Street

New York, New York 10019-9710

T: +1 212.836.8474

Christopher M. Odell

Texas State Bar No. 24037205

Christopher.Odell@arnoldporter.com

700 Louisiana Street, Suite 4000

Houston, TX 77002-2755

Telephone: +1 713.576.2400

Fax: +1 713.576.2499

Ryan Patrick Brown

Texas State Bar No. 24073967

brown@blackburnbrownlaw.com

1222 S. Fillmore

Amarillo, TX 79101

Tel: (806) 371-8333

Fax: (806) 350-7716

Attorneys for Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, and Planned Parenthood San Antonio

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of February, 2023, I caused the foregoing to be served by email through the Court's Electronic Case Filing system upon all attorneys of record.

/s/ Tirzah S. Lollar
Tirzah S. Lollar